IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

GREGORY THOMPSON)
Plaintiff,))
v.)) CASE NO. 1:09-cv-1113-GBL/TRJ
WACKENHUT SERVICES, INC.))
Defendant.)
)

DEFENDANT'S MOTION FOR RULE 37 SANCTIONS

COMES NOW the Defendant, Wackenhut Services, Incorporated, by counsel, and moves of the Court for the entry of an order prohibiting the Plaintiff from introducing any evidence at trial to support any claim for special damages, including but not limited to, any claims related to medical, hospital and related expenses incurred by Plaintiff as a result of the December 6, 2007 incident, and as grounds therefor, incorporates the attached memorandum in support.

Respectfully submitted,

DOMBROFF GILMORE JAQUES & FRENCH

<u>'s/</u>

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COUNSEL FOR DEFENDANT

WACKENHUT SERVICES, INCORPORATED

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of August, 2010, I will electronically file the foregoing Motion for Rule 37 Sanctions with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Angela Hope France, Esq. PCT Law Group, LLC 1725 Duke Street Suite 240 Alexandria, VA 22314 Telephone: 703-881-9141 Facsimile: 703-972-9153

Co-counsel for Plaintiff Email: afrance@pctlg.com

And I hereby certify that on August 9, 2010, I will mail the document by U.S. mail to the following non-filing user:

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/s

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